

11737

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
GLOBAL LOGISTICS GROUP LTD.,

Plaintiff,

- against -

YONG HE SHIPPING (HK) LTD.,  
AEGEAN CARRIERS S.A.,  
SOUTH AEGEAN SHIPPING S.A., &  
PROSPER SHIPPING LIMITED,

Defendants.  
-----X

Plaintiff, **GLOBAL LOGISTICS GROUP LTD.**, (hereinafter “**GLGL**”), by its attorneys, **JUNGE & MELE, LLP**, complaining of the Defendants, **YONG HE SHIPPING (HK) LTD. (“YONG HE”), PROSPER SHIPPING LIMITED (“PROSPER”), AEGEAN CARRIERS S.A. (“AEGEAN”) and SOUTH AEGEAN SHIPPING S.A. (“SOUTH AEGEAN”)**, states and alleges the following upon information and belief:

1. This is a case of admiralty jurisdiction pursuant to 28 U.S.C. § 1333(1) and a maritime claim within the meaning of Rules 9(h) and 38(e) of the Federal Rules of Civil Procedure.

2. At all times relevant, plaintiff **GLGL** was a foreign corporation with a place of business located at c/o Altomar Maritime Inc., as agents only, 5995 Gouin Blvd. West, Suite 200, Montreal, Quebec, Canada H4J 2P8, and was the disponent owner of the vessel “**AFEA**.”

Case No. 07 CIV 10654  
(Judge Scheindlin)

**VERIFIED AMENDED  
COMPLAINT**

3. At all times relevant, Defendant **YONG HE** was a foreign business corporation, with a place of business located at Flat B, 10/F, Civic Comm. Bldg., 165-167 Woo Sung St., Kowloon, Hong Kong, and is not present within this District, or any nearby district, pursuant to Rule B(1) of the Supplemental Rules for Certain Admiralty and Maritime Claims of the Federal Rules of Civil Procedure.

4. At all times relevant, Defendant **PROSPER SHIPPING LIMITED** ("**PROSPER**"), was a foreign business company located at Unit 2401A 24/F, Park-In Commercial Centre, 56 Dundas Street, Mongkok, Kowloon, Hong Kong, and is not present within this District, or any nearby district, pursuant to Rule B(1) of the Supplemental Rules for Certain Admiralty and Maritime Claims of the Federal Rules of Civil Procedure.

5. At all times relevant, Defendant **AEGEAN** was a foreign business company, with its place of business located at Bona Vista Building-3, Xanthou Street, 16674 Glyfada, Athens, Greece, and is not present within this District, or any nearby district, pursuant to Rule B(1) of the Supplemental Rules for Certain Admiralty and Maritime Claims of the Federal Rules of Civil Procedure.

6. At all times relevant, Defendant **SOUTH AEGEAN** was a foreign business company, with its place of business located at Bona Vista Building-3, Xanthou Street, 16674 Glyfada, Athens, Greece, and is not present within this District, or any nearby district, pursuant to Rule B(1) of the Supplemental Rules for Certain Admiralty and Maritime Claims of the Federal Rules of Civil Procedure.

7. On August 24, 2007, **GLGL**, as disponent owner of the *AFEA*, time chartered the vessel to **YONG HE** for one voyage of about 65 days from mainland ports in China to eastern and central Mediterranean ports, at a daily rate of hire of \$38,000, payable every 15 days. A true copy of the "Recap" message setting forth the materials terms and conditions of the said voyage charter is attached hereto as **Exhibit "1."**

8. Defendants **PROSPER**, **AEGEAN** and **SOUTH AEGEAN**, have dominated and used Defendant **YONG HE**, for their own purposes, and said Defendants are alter egos of one another in that there existed at all relevant times such unity of ownership and interest that no separation exists between them and there is no meaningful difference between these entities; they have disregarded the corporate form for the improper purpose of evading obligations to creditors by, among other things, having directed and controlled all activities and communications of **YONG HE**, and by having paid charter hire due and owing from **YONG HE** to **GLGL**.

9. Specifically, on September 11, 2001, September 26, 2001, October 16, 2001 and October 26, 2001, **PROSPER** made charter hire payments to Plaintiff on behalf of **YONG HE** in excess of \$2.5 million dollars. **AEGEAN** supplemented these hire payments to Plaintiff by paying \$94,365.40 on September 11, 2001 on behalf of **YONG HE**, while **SOUTH AEGEAN** similarly paid \$6,165.012 to Plaintiff on behalf of **YONG HE** on October 3, 2007. Attached hereto as **Exhibit "2"** are true copies of banking statements evidencing these payments.

10. Additionally, **PROSPER** made hire payments to other vessel owners in

separate transactions which have recently been the subject of Rule B proceedings where orders of attachment were issued by this court against **PROSPER** as an alter ego of **YONG HE**. See *Padre Shipping Inc. v. Yong He Shipping (HK) Limited, Prosper Shipping Limited, et.al.*, Docket No. 07 CIV. 9682 (Judge Keenan), filed on October 31, 2007; and, *Industrial Carriers Inc. v. Yong He Shipping (HK) Ltd., Prosper Shipping Limited*, Docket No. 07 CIV. 9706 (Judge Crotty), filed on November 1, 2007.

11. After November 2, 2007, contrary to the charter party obligation to pay charter hire to **GLGL** every 15 days, **YONG HE** and the alter ego Defendants failed to make the 5<sup>th</sup> and 6<sup>th</sup> hire payments and settle final adjustments, including bunker expenses and other charges due and owing to Plaintiff, which aggregate to the amount of \$730,409.89, and as such, are in breach of maritime contract with GLGL. A true copy of the Final Hire Statement rendered by **GLGL** is attached hereto as **Exhibit “3.”**

12. Under the terms of the charter party Recap, disputes between the parties are to be resolved in arbitration at London, under English law, and this proceeding is brought in aid of said arbitration, either pending or contemplated.

13. As best can now be estimated, Plaintiff expects to recover the following amounts in the London arbitration: on the principal claim, \$730,409.89; on interest, costs and attorney’s fees through the end of arbitration in London, \$100,000; for a total award amount of \$830,409.89.

14. Defendants cannot be found within this District within the meaning of Rule B of the Supplemental Rules for Certain Admiralty and Maritime Claims of the Federal

Rules of Civil Procedure, but Defendants are believed to have or will have during the pendency of this action, assets within this District consisting of cash, funds, freight, hire, or credits including but not limited to electronic fund transfers in the hands of garnishees in this District, including but not limited to the following:

1. Citibank, N.A.
2. Bank of America, N.A.
3. Bank of New York
4. Credit Suisse
5. JPMorgan Chase Bank
6. Commerce Bank
7. HSBC (USA) Bank
8. BNP Paribas
9. ABN AMRO Bank
10. Standard Chartered Bank
11. UBS, A.G.
12. Barclay's Bank
13. Wachovia Bank
14. Deutsche Bank and/or Deutsche Bank Trust Co. Americas
15. American Express Bank

**WHEREFORE**, Plaintiff prays for the following relief:

1. That process in due form of law according to the practice of this Court be issued against Defendants and that Defendants be cited to appear and answer the allegations herein;

2. That since Defendants cannot be found within this District pursuant to Rule B of the Supplemental Rules for Certain Admiralty and Maritime Claims, this Court issue an Order directing the Clerk of Court to issue Process of Maritime Attachment and Garnishment pursuant to Rule B of the Supplemental Rules for Certain

Admiralty and Maritime Claims, attaching all of the Defendants' tangible or intangible property or any other funds held by garnishees including but not limited to the aforementioned garnishees in the District which are due and owing or otherwise the property of Defendants up to the amount of \$830,409.89, to secure Plaintiff's claims, and that all persons claiming any interest in the same be cited to appear and pursuant to Supplemental Admiralty Rule B answer the matters alleged in this Verified Amended Complaint.

3. That such property attached pursuant to the Processes of Maritime Attachment and Garnishment remain sequestered to serve as security for the payment of Plaintiff's claims as they may be embodied in any award issued out of arbitration in London.

4. That Plaintiff have such other and further and different relief as may be just and proper, including judgment against Defendants, along with interest, costs and disbursements as allowable under law.

Dated in the City of New York on November 29, 2007

Respectfully submitted,

JUNGE & MELE, LLP  
*Attorneys for Plaintiff*

A handwritten signature in black ink, appearing to read 'PJ', is written over a horizontal line.


Peter A. Junge (PJ-0745)  
29 Broadway  
New York, NY 10006  
(212) 269-0061

VERIFICATION

PETER A. JUNGE declares as follows:

1. I am a member of the bar of this Honorable Court and of the firm of Junge & Mele, LLP, attorneys for Plaintiff.
2. I have read the foregoing Amended Complaint and I believe the contents thereof are true.
3. The reason this Verification is made by deponent and not the Plaintiff is that Plaintiff is a foreign corporation with no officers or directors within this jurisdiction.
4. The source of my information and belief are documents provided to me, statements made to me by representatives of Plaintiff, and publicly available documents concerning the Defendants on the internet.
5. I declare under penalty of perjury that the foregoing is true and correct.

Dated in the City of New York on November 29, 2007

  
Peter A. Junge

> Final recap  
>  
> ----- Original Message -----  
> From: FIX-OCEANTRANS CHARTERING  
> To: chartering@altomar.com  
> Cc: trading@altomar.com  
> Sent: Friday, August 24, 2007 7:58 PM  
> Subject: Re: MV AFEA / YONG HE SHIPPING  
>  
>  
> PETER/KUTTY  
>  
> RE MV AFEA / YONG HE SHIPPING  
>  
> FLW REC FM CHARTS,  
>  
> QTE:  
>  
> RE : MV AFEA/YONG HE  
> ==  
>  
> FINAL RECAP WTH ALL SUBS LIFTED AND IN OREDR  
>  
> -AC :YONG HE SHIPPING OF HONG KONG  
>  
> -M/V AFEA  
>  
> SINGLEDECK/BULK CARRIER-FUTURE 32  
> 37.659 DWAT ON 10.768 M SSW  
> CYPRUS FLAG - BUILT 1982  
> LOA 187.03 M / 28.04 M  
> 5 HO / 5 HA - 5 X 15 TONS CRANES  
> GRT 22,395 / NRT 12,100  
> GR/BL ABT 45865 / 44394  
> SPEED ABT 12.0 KT ON 17B/19L MTS IFO + 3.0 MTS MDO AT SEA  
> ALL DETAILS ABT  
>  
> -DELY : DLOSP XINGANG  
>  
> -LAYCAN :9 /16 SEPT 2007  
>  
> - 1 T/C TRIP WITH DURATION OF ABT 65 DAYS DAYS WOG VIA CHINA MAIN PORTS

EXHIBIT

> TO EAST /CENTRAL MED PORTS CHOPT VIA SBS SPS AND/OR ANCHORAGES IN/OUT  
 > GEOG  
 > ROT AA AA AWIWL.  
 >  
 > INTN CARGOES  
 > Only homogeneous bulk or bagged cargoes,steels ,generals without any fire  
 > risk.  
 >  
 > -REDEL: DOP CENTRAL MED OR WEST MED PORT CHOPT ATDNFHINC  
 >  
 > -HIRE US\$ 38000 DIOT PAYABLE EVERY 15 DAYS IN ADVANCE TO OWNERS  
 > NOMINATED BANK ACCT  
 >  
 > -1ST HIRE PLUS VALUE OF BOD TO BE PAID ON VSL'S DEL TO OWRS NOM ACCT  
 >  
 > -BOD/BOR TO BE ABT SAME .  
 >  
 > - BOD/BOR TO BE ADJUSTED AT SAME PRICES. BOD ABT 380 MT IFO AND ABT 60 MT  
 > MDO  
 > PRICES USD 420/625 FOR IFO/MDO RESP.  
 >  
 > -CHOPT TO DEDUCT FM LAST OR PENULTIMATE SUFFICIENT HIRE PAYMENT(S) ESTM  
 > COST OF BOR  
 >  
 > -OWRS WARRANT VSL'S HATCH-COVERS ARE WATER-TIGHT AND TO REMAIN SO DURING  
 > THE CHARTER  
 >  
 > - VESSEL MUST BE CLASSED / P & I AND H&M COVERED AND MAINTAINED FOR THE  
 > ENTIRE DURATION OF CHARTER PARTY.  
 >  
 > -VSL TO BE DEL WITH HATCHES/HOLDS DRY, CLEAN AND SUITABLE FOR LOADING  
 > INTENDED CARGO AND TO BE REDEL IN SIMILAR CONDITION  
 >  
 > -ILOHC US\$ 3500 L/SUM EXCL DUNNAGE DISPOSAL/REMOVAL WHICH FOR CHRT ACC +  
 > TIME  
 >  
 > -INTERMEDIATE HOLDS CLEANING IF REQUIRED BY CHRS US\$500 PER HOLD PER VOY.  
 >  
 > -OWRS WARRANT VSL/OWRS IS ISM CERTIFIED/COMPLIANT  
 >  
 > - OWNERS TO GUARANTEE SAFE WORKING LOAD OF THE GEARS AS DESCRIBED ABOVE.  
 >  
 > -IN CASE ORIG BS/L NOT AVAILABLE AT DISPORT, OWRS AGREE TO RELEASE ENTIRE  
 > CARGO AGAINST CHRS LOI (AS PER OWNERS P+I CLUB FORMAT) SIGNED BY CHRS  
 > ONLY  
 >  
 > -CBL/VIC/ENT US\$ 1400 L/SUM PER 30 DAYS OR PRORATA  
 >  
 > -OWRS/MASTER TO AUTHORIZE CHRS OR THEIR AGENTS TO SIGN/RELEASE ORIGINAL  
 > BS/L AT LOADPORT ON THEIR BEHALF AND SAME (BS/L) TO BE STRICTLY IN  
 > ACCORDANCE WITH MATE'S RECEIPT  
 >  
 > -WATCHMEN TO BE FOR ACCT OF PARTY ORDERING SAME, COMPALSORY WATCHMEN CHRTS  
 > ACC  
 >  
 > -ARB + GA IN LONDON AND ENGLISH LAW TO APPLY  
 >  
 > - CARGO/TRADING EXCLUSIONS AS ATTACHED  
 >  
 > - DECK OPTION ALLOWED  
 >  
 > -CHRTS SUBS /SHIPPERS/RECEIVERS APPROVAL LIFTED AND IN ORDER  
 >  
 > -OTHERWISE OWRS BTB C/P LOGICALLY AMENDED AS PER M/T WITH TTL COMM 5%  
 >  
 > END  
 >

> FGOS PLS RECONFIRM  
>  
> PLS ADV VSL'S PRESENT POSITION / ITINERARY AND ESTIMATED TIME OF DELY  
>  
> TKS VM FOR THIS FIXTURE  
>  
>  
> UQTE;  
>  
> BRGDS/OCEANTRANS  
> Regards  
> John  
>  
> Altomar Maritime Inc.  
> 5995 Gouin Blvd West  
> Suite, 200  
> Montreal, Quebec, Canada  
> H4J 2P8  
> Tel: 514-388-8280  
> Fax: 514-388-5436  
> E-mail:  
> Dry orders to: chartering@altomar.com  
> Wet orders to: tankers@altomar.com  
> Skype: altochart  
> Website www.altomar.com  
> To receive our circulation list, subscribe/un-subscribe at  
> <http://www.altomar.com/maillist.asp>

EXHIBIT "2"

EHIBEBALZEH AHOETOZHE MHNVMATOE SWIFT

=====

KATAETHMA: KENTPIKH - AIOIKHEH HMEPOMHNA: 11 EEN 2007  
TRANSACTION REFERENCE NUMBER: FT0725404853  
ORIGINATING TRANSACTION NUMBER: FT0725404853 /316  
CURRENCY AND AMOUNT: USD94365.40 VALUE DATE: 11 EEN 2007  
ORDERING CUSTOMER: /GR2202803160000000232457425  
AEGEAN CARRIERS S.A.  
BONA VISTA BUILDING

ORDERING INSTITUTION:

RECEIVER BANK:

RECEIVER'S CORRESPONDENT:

INTERMED ACCOUNT:

INTERMEDIARY BANK: SW-CHASUS33XXX JPMORGAN CHASE BANK, N.A.

PAY BANK BRANCH:

PAY BANK ACCOUNT:

PAYING BANK: SW-BNTBBMHMXX BANK OF N.T. BUTTERFIELD AND SON LI

BENEFICIARY ACCOUNT:20006840414932100

BENEFICIARY:GLOBAL LOGISTICS GROUP LTD

DETAILS OF PAYMENT: 1ST HIRE M/V AFEA/YHS

CHARGES:OUR  
INFORMATION:

INPUTTER:676\_OIKONOMOUMA

11 EEN 2007 316 FT0725404853

Branch  
 分行

Application for Outward Remittance/Cashier's Order  
 匯款 / 本票申請書

I/We hereby request you to issue a  
 on my/our behalf with the following details:  
 本人(等)茲委託貴行以下列資料發出

☐ Telegraphic Transfer 電匯 ☐ Mail Transfer 信匯 ☐ Demand Draft 匯票 ☐ Cashier's Order 本票 ☐ CHATS 銀行電子過賬系統

32A	Currency and Amount 貨幣及金額	Currency & amount in words 貨幣及大寫金額 US DOLLARS FIVE HUNDRED FIFTY FIVE THOUSAND SEVEN HUNDRED FIFTY ONLY	Currency & amount in figures 貨幣及小寫金額 USD 555,750.00
*Town and Country drawn on *付款之城市及國家			
50	Applicant/ Remitter 申請人/匯款人	Name 姓名 PROSPER SHIPPING LIMITED Account No. 賬戶號碼 015-514-25-09020-0 Address 地址 UNIT 2401A 24/F PARK-IN COMMERCIAL CENTRE 56 DUNDAS STREET MONGKOK KOWLOON	Identity Document No.: 身份證明文件號碼: Date of Birth (DD/MM/YY): 出生日期(日/月/年): Telephone No.: 電話號碼: 13901037257
54 56	Intermediary Bank and its address (Receiver's Corr. Bank) 收款銀行之代理行及其地址	JP MORGAN CHASE, N.Y. SWIFT CODE: CHASUS 33	
57	Beneficiary's Banker 收款人之銀行	Name 名稱 THE BANK OF BUTTERFIELD HAMILTON, BERMUDA. SWIFT CODE: BNTBBMMH Address 地址	To facilitate Money Transfers to your beneficiaries in a more efficient way, please fill in the following codes/account number, if any: 為方便匯款予收款人,請填寫下列資料(如有): CHAPS Branch Sort Code <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> (For UK Transfers only) 只適用於英國之匯款 CHIPS Universal Identifier / Fedwire Routing Number (For US Transfers only) 只適用於美國之匯款 For Credit to Beneficiary's Banker A/C maintained with the Bank (For Outward Remittance to China only) 只適用於中國之匯款
59	**Beneficiary **收款人	Account No. 賬戶號碼 20006-840-414932100 Name 姓名/名稱 GLOBAL LOGISTICS GROUP LTD. Address 地址	Telephone No.: 電話號碼:
70	Message/instructions (if any) 附註/指示(如有) Max. 140 characters including spaces or 20 Chinese words 不多於140個英文字(包括空格、符號及點號) 或20個中文字	HIRE M/V AFEA / YHS	
71A	Additional Handling Charges for the Bank's Correspondents/Agents (See condition on back) 代理同業銀行之附加手續費 (見背頁條款第六條)	<input type="checkbox"/> Charge to beneficiary's account (deduct from the above remittance amount) 由收款人支付(在上述之匯款金額內扣除) <input checked="" type="checkbox"/> Charge to my/our account No. 015-514-25-09020-0 由本人(等)賬戶扣除·匯款	
Despatch of demand draft/cashier's order/ remittance receipt 匯票/本票/匯款 收據發送方式		<input type="checkbox"/> Collect at your counter 向貴行櫃面領取 <input checked="" type="checkbox"/> To me/us by mail/registered mail 平郵/掛號郵寄本人(等) <input type="checkbox"/>	Payment of the remittance/cashier's order plus charges 匯款/本票及費用之 付款方式 <input type="checkbox"/> By Cash 附上現金 <input checked="" type="checkbox"/> Please debit my/our account No. 015-514-25-09020-0 由本人(等)賬戶扣除·匯款
For Bank Use Only 銀行專用		I/We have read the conditions printed overleaf and agree to be bound by them. 本人(等)已閱悉並同意遵守背面所列條款。	
20	Reference No.	I/We acknowledge and agree that in carrying out the remittance instruction(s) my/our personal data and/or information (including but not limited to those contained herein) may be disclosed and transferred to third party/parties, whether located inside or outside Hong Kong. 本人(等)謹此聲明並同意貴行可將香港以外或以香港以外之第三名披露及提供本人(等)的 個人資料及/或資料(包括但不限於本文件內之資料)予貴行之過賬系統。	
Value date		PROSPER SHIPPING LIMITED	
Exchange Rate		Authorized Signature(s)	
HKD Equivalent		Signature(s) of Applicant(s)/Remitter(s) 申請人/匯款人簽署	
Service Charges			
Commission (Sundries)			
Postage / Cable			
Additional Handling Charges			
Total HKD			

INPUTTER:1148\_OIKONOMOUA  
02 OKT 2007 316 PT0737522098

To: The Bank of East Asia, Limited  
致: 東亞銀行有限公司

2712  
III: 11

CC. 36, 2407

Branch  
2:1

## Application for Outward Remittance/Cashier's Order

起 承 / 本 章 中 考 考 點

We hereby request you to issue a  
an night lunch with the following details  
人 ( ) 姓名 姓名 姓名 姓名 姓名

☐ Telegraphic transfer

☐ M2 Transfer

☐ Second Draft

☐ Cash or Order

☐ 0-4TB  
100-200GB

33A	Currency and Amount 20190910	Currency & amount in words 壹仟玖佰玖拾玖萬零陸百零陸元正 US DOLLARS FOUR HUNDRED NINE THOUSAND KING HUNDRED EIGHTY TWO CENTS FIFTY ONE ONLY	Currency & amount in figure 1990982.51
34	*Town and Country drawn on H.K. 2 城市及國家		
35	Name 公司名稱	PROSPER SHIPPING LIMITED	Identify Document No. 文件證明號碼
36	Account No. 銀行戶口號碼	015-514-25-09020-0	Date of Issue 發出日期
37	Address 地址	UNIT 2401A 24/F PARKIN COMMERCIAL CENTRE 56 DUNDAS STREET MONGKOK KOWLOON	Telephone No. 電話號碼
38	Intermediary Bank and its address (銀行之代理行及地址)	JP MORGAN CHASE, N.Y. SWIFT CODE: CHASUS33	
39	Beneficiary's Bank 收款人之銀行	THE BANK OF BUTTERFIELD HAMILTON, BARBUDA. SWIFT CODE: BNTB8HAM	
40	Beneficiary's Name 收款人之姓名	GLOBAL LOGISTICS GROUP LTD.	
41	Address 地址		
42	Message / Instructions (if any) 附註 / 指示 (如有)	M/V AFEA/YHS	
43	Additional Handling Charges for the Bank's Correspondent Accounts (銀行之代理行戶口之附加手續費)		
44	Payment of the remittance (匯款之支付)	By Cash 現金	
45	By Cash 現金		
46	By Cash 現金		
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100	By Cash 現金		

☐ 1-800-Graphic Transfer ☐ 1/2" Transfer ☐ Deming Draft ☐ Customer's Order ☐ G-475  
1349 1350 1351 1352 1353 1354 1355 1356 1357 1358 1359 1360 1361 1362 1363 1364 1365 1366 1367 1368 1369 1370 1371 1372 1373 1374 1375 1376 1377 1378 1379 1380 1381 1382 1383 1384 1385 1386 1387 1388 1389 1390 1391 1392 1393 1394 1395 1396 1397 1398 1399 1400 1401 1402 1403 1404 1405 1406 1407 1408 1409 1410 1411 1412 1413 1414 1415 1416 1417 1418 1419 1420 1421 1422 1423 1424 1425 1426 1427 1428 1429 1430 1431 1432 1433 1434 1435 1436 1437 1438 1439 1440 1441 1442 1443 1444 1445 1446 1447 1448 1449 1450 1451 1452 1453 1454 1455 1456 1457 1458 1459 1460 1461 1462 1463 1464 1465 1466 1467 1468 1469 1470 1471 1472 1473 1474 1475 1476 1477 1478 1479 1480 1481 1482 1483 1484 1485 1486 1487 1488 1489 1490 1491 1492 1493 1494 1495 1496 1497 1498 1499 1500 1501 1502 1503 1504 1505 1506 1507 1508 1509 1510 1511 1512 1513 1514 1515 1516 1517 1518 1519 1520 1521 1522 1523 1524 1525 1526 1527 1528 1529 1530 1531 1532 1533 1534 1535 1536 1537 1538 1539 1540 1541 1542 1543 1544 1545 1546 1547 1548 1549 1550 1551 1552 1553 1554 1555 1556 1557 1558 1559 1560 1561 1562 1563 1564 1565 1566 1567 1568 1569 1570 1571 1572 1573 1574 1575 1576 1577 1578 1579 1580 1581 1582 1583 1584 1585 1586 1587 1588 1589 1590 1591 1592 1593 1594 1595 1596 1597 1598 1599 1600 1601 1602 1603 1604 1605 1606 1607 1608 1609 1610 1611 1612 1613 1614 1615 1616 1617 1618 1619 1620 1621 1622 1623 1624 1625 1626 1627 1628 1629 1630 1631 1632 1633 1634 1635 1636 1637 1638 1639 1640 1641 1642 1643 1644 1645 1646 1647 1648 1649 1650 1651 1652 1653 1654 1655 1656 1657 1658 1659 1660 1661 1662 1663 1664 1665 1666 1667 1668 1669 1670 1671 1672 1673 1674 1675 1676 1677 1678 1679 1680 1681 1682 1683 1684 1685 1686 1687 1688 1689 1690 1691 1692 1693 1694 1695 1696 1697 1698 1699 1700 1701 1702 1703 1704 1705 1706 1707 1708 1709 1710 1711 1712 1713 1714 1715 1716 1717 1718 1719 1720 1721 1722 1723 1724 1725 1726 1727 1728 1729 1730 1731 1732 1733 1734 1735 1736 1737 1738 1739 1740 1741 1742 1743 1744 1745 1746 1747 1748 1749 1750 1751 1752 1753 1754 1755 1756 1757 1758 1759 1760 1761 1762 1763 1764 1765 1766 1767 1768 1769 1770 1771 1772 1773 1774 1775 1776 1777 1778 1779 1780 1781 1782 1783 1784 1785 1786 1787 1788 1789 1790 1791 1792 1793 1794 1795 1796 1797 1798 1799 1800 1801 1802 1803 1804 1805 1806 1807 1808 1809 1810 1811 1812 1813 1814 1815 1816 1817 1818 1819 1820 1821 1822 1823 1824 1825 1826 1827 1828 1829 1830 1831 1832 1833 1834 1835 1836 1837 1838 1839 1840 1841 1842 1843 1844 1845 1846 1847 1848 1849 1850 1851 1852 1853 1854 1855 1856 1857 1858 1859 1860 1861 1862 1863 1864 1865 1866 1867 1868 1869 1870 1871 1872 1873 1874 1875 1876 1877 1878 1879 1880 1881 1882 1883 1884 1885 1886 1887 1888 1889 1890 1891 1892 1893 1894 1895 1896 1897 1898 1899 1900 1901 1902 1903 1904 1905 1906 1907 1908 1909 1910 1911 1912 1913 1914 1915 1916 1917 1918 1919 1920 1921 1922 1923 1924 1925 1926 1927 1928 1929 1930 1931 1932 1933 1934 1935 1936 1937 1938 1939 1940 1941 1942 1943 1944 1945 1946 1947 1948 1949 1950 1951 1952 1953 1954 1955 1956 1957 1958 1959 1960 1961 1962 1963 1964 1965 1966 1967 1968 1969 1970 1971 1972 1973 1974 1975 1976 1977 1978 1979 1980 1981 1982 1983 1984 1985 1986 1987 1988 1989 1990 1991 1992 1993 1994 1995 1996 1997 1998 1999 2000 2001 2002 2003 2004 2005 2006 2007 2008 2009 2010 2011 2012 2013 2014 2015 2016 2017 2018 2019 2020 2021 2022 2023 2024 2025 2026 2027 2028 2029 2030 2031 2032 2033 2034 2035 2036 2037 2038 2039 2040 2041 2042 2043 2044 2045 2046 2047 2048 2049 2050 2051 2052 2053 2054 2055 2056 2057 2058 2059 2060 2061 2062 2063 2064 2065 2066 2067 2068 2069 2070 2071 2072 2073 2074 2075 2076 2077 2078 2079 2080 2081 2082 2083 2084 2085 2086 2087 2088 2089 2090 2091 2092 2093 2094 2095 2096 2097 2098 2099 2100 2101 2102 2103 2104 2105 2106 2107 2108 2109 2110 2111 2112 2113 2114 2115 2116 2117 2118 2119 2120 2121 2122 2123 2124 2125 2126 2127 2128 2129 2130 2131 2132 2133 2134 2135 2136 2137 2138 2139 2140 2141 2142 2143 2144 2145 2146 2147 2148 2149 2150 2151 2152 2153 2154 2155 2156

US DOLLARS EIGHT HUNDRED EIGHTY EIGHT THOUSAND  
FIVE HUNDRED ONLY.

USD 888,500.00

PROSPER SHIPPING LIMITED

015-514-25-09020-0

UNIT 2401A, 24/F PARK-IN COMMERCIAL CENTRE  
55 DUNDAS STREET MONGKOK KOWLOON

JP MORGAN CHASE, N.Y.

SWIFT CODE : CHASUS 33

THE BANK OF BUTTERFIELD HAMILTON, BERMUUDA.

SWIFT CODE: BNTBB8MH/M

To facilitate money transfer to your bank please fill in the following code (International Bank Account Number - IBAN) and the SWIFT code (BIC) of your bank.

-442 Branch St. Corvallis, OR 97331  
 Tel: 503/325-0101 Fax: 503/325-0102

CHIPS (wireless) Identification: \_\_\_\_\_ | \_\_\_\_\_ | \_\_\_\_\_ | \_\_\_\_\_ | \_\_\_\_\_ | \_\_\_\_\_  
 Expiring: Expiration Number (for US transfers only) 8 2 1 1 0 1 1 2 1 2

For Credit to Beneficiary's Bank: A/C is debited with the sum.  
(For Outward Remittance to Beneficiary's Bank: A/C is debited with the sum.)

20006 - 840 - 414932100

GLOBAL LOGISTICS GROUP LTD

M/V ATEA/YHS

④ 对“ $\frac{1}{2}mv^2$ ”求导，得  $\frac{1}{2}m \cdot 2v \cdot \frac{dv}{dt} = mv \cdot \frac{dv}{dt}$ ，即  $\frac{d}{dt} \left( \frac{1}{2}mv^2 \right) = mv \cdot \frac{dv}{dt}$ 。

☒ Charge to : your account. No. 015-514-25-09020-0

$\Gamma = 1.3 \times 10^{-4}$  (for  $\Gamma = 10^{-4}$ )  
 $\Gamma = 1.3 \times 10^{-4}$  (for  $\Gamma = 10^{-4}$ )

(U) To reach by the long street rail  
5/17/1964

Department of the  
Interior, Bureau of  
Land Management  
Washington, D.C. 20250

☐ by Cash

☒ I desire a copy of my report. 015-514-25-01020-0

For  $E_n = 2$  and  $G_n = 1$ ,  $d = 2$  and  $\alpha = 1$  we have

Page 1 of 1

**Keywords:** child sexual abuse; disclosure; social support

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2025.05.20

[illegible]

514 450

I/We have read the conditions printed overleaf and agree to be bound by them.  
本人(等)已細閱並同意接受背面所印條款：

I/We acknowledge and agree that in carrying out the remittance instructions, my/our personal data and/or information (including but not limited to those contained herein) may be disclosed and transferred to third parties, whether located inside or outside Hong Kong.

本人(等)保證並同意：貴行可向香港以外地區以外的第三者披露及得學本人(等)的個人資料及/或資料本行時用不同的用途及目的(包括)以轉售予第三者為限。

PROCTER & GAMBLE COMPANY

Signature(s) of Applicant(s) (if more than one)  
= 11 11 21 21 31 31



## GLOBAL LOGISTICS GROUP LTD.

C/o Altomar Maritime Inc.  
5995 Gouin Blvd. West, Suite 200  
Montreal, Quebec, Canada, H4J 2P8  
Tel: 1-514-388-8280 Fax: 1-514-388-5436  
www.globallogisticsgroup.com

Delivery of ship: 10/09/07 GMT  
10/11/07 - 12:00 GMT  
10/12/07 - 12:00 GMT

Statement of account no.:

PF

## MV Afea-Yong He Shipping (HK) Ltd.

cp dtd 08/24/07

					Debit	Credit	Comments
					OWNERS	CHARTS	
<b>1.) Hire:</b>	<b>FROM</b>	<b>TO</b>	<b>= DAYS</b>	<b>AT RATE</b>			
a)	11/09/07 - 12:00 GMT	10/12/07 - 12:00 GMT	90.000000	\$38,000.00	\$3,420,000.00		<b>Estimated Redelivery</b>
<b>Off-Hire:</b>							
b)	10/09/07 01:00	10/24/07 01:00	0.13403	\$38,000.00		5099.06	STORAGE RELOI
	10/12/07 01:00	10/17/07 01:00	0.06075	\$38,000.00		2300.00	STORAGE RELOI
	10/17/07 01:00	10/19/07 01:00	0.02100	\$38,000.00		800.00	STORAGE RELOI
<b>2.) Commissions:</b>							
	address comm. (%)						
a)	\$3,420,000.00	2.50				\$85,500.00	
<b>Off-Hire:</b>							
b)	\$54,493.06	2.50			\$1,362.33		
<b>3.) Bunkers</b>		<b>Qty metric tons</b>		<b>Price</b>			
<b>Bunkers on Delivery</b>							
Marine fuel oil	444.910	x	\$420.00	\$186,862.20			AS PER SURVEYOR
Marine gas oil	90.460	x	\$625.00	\$56,537.50			AS PER SURVEYOR
<b>Bunkers on Redelivery</b>							
Marine fuel oil	0.000	x	\$420.00			0.00	
Marine gas oil	0.000	x	\$625.00			0.00	
<b>Bunkers Off-hire</b>							
Marine fuel oil	0.000	x	\$420.00			0.00	
Marine gas oil	1.89	x	\$625.00	\$1,181.25			
Marine fuel oil	2.22	x	\$420.00	\$932.40			
Marine gas oil	0.13403	x	\$625.00	\$83.76			
<b>4.) Charterers expenses</b>							
	lpsun pm/pr		Days				
Lumpsum CVE	\$1,400.00		90.00000	\$4,142.47			
ILOHC	\$3,500.00		End of voyage	\$3,500.00			
SURVEYS EXPENSES SHARED 50/50				\$800.00			
INTEREST FOR LATE PMT OF 3RD HIRE				\$898.56			
<b>5.) Owners expenses</b>							
<b>6.) Charterers remittances</b>							
Partial 1st hire		9/11/2007				\$94,365.40	
Balance 1st hire		9/13/2007				\$700,000.00	
Partial 2nd hire		9/28/2007				\$555,750.00	
Balance 2nd hire		10/2/2007				\$6,165.12	
Partial 3rd hire		10/12/2007				\$145,767.49	
Balance 3rd hire		10/19/2007				\$409,982.51	
4th hire		11/2/2007				\$888,500.00	
<b>Totals</b>					\$3,674,103.05	\$2,943,693.16	
<b>Please remit to:</b>	<b>Balance in</b>	<b>-</b>	<b>our favour</b>		\$3,674,103.05	\$3,674,103.05	

JP Morgan Chase  
One Chase Manhattan Plaza, 35th Floor  
New York, N.Y. 10081  
ABA: 021000021  
Swift Address: CHASUS 33

Credit to the account of:  
The Bank of Butterfield  
Hamilton, Bermuda  
Swift Address: BNTBBMHM  
Account: 001-1-067808

EXHIBIT

3